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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index Number 810]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.07d.v.b [Index Number 810]. This ITAAC verified for the non-radiologically controlled area of the auxiliary building, non-Class 1E wiring which is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated as Class 1E wiring.

The closure process for this ITAAC is based on the guidance described in NEI-08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52" which is endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 3.3.00.07d.v.b [Index Number 810]

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Southern Nuclear Operating Company
ND-21-0298
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
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ITAAC Statement

Design Commitment

7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

Inspections, Tests, Analyses

Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class1E cables is consistent with the following:

v) Non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.

Acceptance Criteria

Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

v.b) For areas in the non-radiologically controlled area of the auxiliary building, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated as Class 1E wiring.

ITAAC Determination Basis

Multiple ITAAC are performed to ensure that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables. In accordance with this ITAAC, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance and for which no barrier or analysis is provided is considered as associated circuits and subject to Class 1E requirements. The subject ITAAC requires inspections of the Class 1E and non-Class 1E raceways in the non-radiologically controlled area of the auxiliary building to confirm that non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements. The Class 1E cables and raceways and non-Class1E cables in the non-radiologically controlled area of the auxiliary building are designed to be appropriately separated in accordance with APP-GW-E1-001 (Reference 1). Installation specifications provided to the constructor identify separation criteria, consistent with the ITAAC commitment.

Class 1E electrical cables and raceways are required to be installed in accordance with design drawings, installation specifications issued for construction, and work package requirements. Completed raceway installation, in-progress and completed cable installation, and completed cable terminations are inspected to ensure the separation installation specifications are satisfied. Inspections are performed in accordance with the Construction Quality Verification Program 26139-000-4MP-T81C-N7101 (Reference 2). ITAAC 3.3.00.07d.ii.b [Index 801] will

confirm that inspection records are completed to document the satisfactory separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables.

Cable Separation Report for Associated Circuits (Reference 4) confirmed that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

For areas in the non-radiologically controlled area of the auxiliary building, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.

There are associated circuits in the non-radiologically controlled area of the auxiliary building in the Main Control Room at the lighting cables from double fuse panels SV3-IDSB-EA-5 and SV3-IDSC-EA-5 to dimmer switches SV3-ELS-EL-SB31 and SV3-ELS-EL-SC31 and downstream fixtures (Reference 3).

The Cable Separation Report for Associated Circuits (Reference 4) is available for NRC inspection as part of the Unit 3 ITAAC 3.3.00.07d.v.b Completion Packages (Reference 5).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings and associated corrective actions. This review found no relevant ITAAC findings associated with this ITAAC.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.3.00.07d.v.b was performed for VEGP Unit 3 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. APP-GW-E1-001, "Electrical Systems Design Criteria"
2. 26139-000-4MP-T81C-N7101, "Bechtel Construction Quality Verification Program"
3. APP-GW-E0R-006, "IEEE 384 Design Compliance Description"
4. SV3-CSR-ITR-800810 Rev 0, "Unit 3 Cable Separation Report for Associated Circuits"
5. 3.3.00.07d.v.b-U3-CP-Rev0, ITAAC Completion Package